FREEMAN, NOOTER & GINSBERG

_ ATTORNEYS AT LAW

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June 30, 2021

MEMO ENDORSED

The Application is granted.

RDERED:

Paul G. Gardephe, U.S.

Dated: July 2, 2021

Honorable Paul G. Gardephe United States District Judge Southern District of New York Thurgood Marshal Courthouse 40 Foley Square New York, NY 10007

RE: United States v. Tonya Thomas (Rose, et al), 19 Cr. 789 (PGG)

Your Honor:

I am writing to request a one-time modification of my client's bail conditions.

My client is currently released on a PRB with two co-signers, and her travel limits include the Southern and Eastern District of New York

My application is that the Court grant permission for her to travel to Atlandic City, New Jersey, on July 2, 2021, returning to New York on July 5, 2021 so that she can be with friends during the July 4th weekend. She will be staying at "Resorts Beach Resort" located at 1900 Pacific Avenue, Atlantic City. She will have her cellular telephone and will notify her Pre-Trial Officer when she arrives there and when she arrives back in New York upon her return.

I communicated this request to AUSA Matthew Andrews and he has no objection if Pre-Trial has no objection. I communicated with Pre-Trial Officer Francesca Tessier-Miller who responded to me that she has no objection provided that she is notified as I stated above.

Thus, I request that Ms. Thomas be allowed to travel to Atlantic City, New Jersey on July 2, 2021 and return to New York City on July 5, 2021, and that all other conditions of her bail bond remain the same.

Thank you.

Sincerely,

/s/ Thomas H. Nooter
Thomas H. Nooter
Attorney for Defendant

cc: AUSA Matthew Andrews, by ECF and email PTSA Francesca Tessier-Miller, by email